

"BILL OF COMPLAINT"

MILDRED N. TOBERY  
330 MADISON STREET  
FREDERICK, MARYLAND

VS.

RUSSELL E. FULMER and  
IRENE FULMER, his wife,  
104 SHERMAN AVENUE,  
FREDERICK, MARYLAND, and  
RUTH E. MOHLER AND RUSSELL  
MOHLER, her husband,  
R. F. D., FREDERICK,  
MARYLAND

NO. 17673 EQUITY

IN THE CIRCUIT COURT

FOR

FREDERICK COUNTY, MARYLAND

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TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Mildred N. Tobery, by Edwin F. Nikirk, her solicitor, respectfully represents unto your Honorable Court:

FIRST: That your Complainant, Mildred N. Tobery, and the Defendants, Russell E. Fulmer and Irene Fulmer, his wife, and Ruth E. Mohler and Russell Mohler, her husband, are all resident of Frederick County, State of Maryland.

SECOND: That all of the parties to this cause, Complainants and Defendants, are adults, and the living children of Mary Elizabeth Fulmer, deceased.

THIRD: That on the 1st day of April, 1953, Mary Elizabeth Fulmer, deceased, departed from this life, intestate, leaving surviving her the following children:

the Complainant, Mildred N. Tobery and the Defendants, Russell E. Fulmer and Ruth E. Mohler.

FOURTH: That at the time of the death of the said Mary Elizabeth Fulmer, she was seized and possessed of a certain parcel of real estate situate, lying and being in Frederick City, Frederick County, Maryland, and being designated at number 330 Madison Street Frederick City, Frederick County, Maryland, as evidenced by a deed dated the 18th day of March, 1922, from Charles R. Handley and Laura V. Handley, his wife, to Lester Fulmer and Mary E. Fulmer, his wife, (the said Lester Fulmer having departed from this life January 15, 1948), said Deed being duly recorded in Liber 338, folio 166c, one of the Land Records of Frederick County, Maryland,